

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF TEXAS  
AMARILLO DIVISION

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ALLIANCE FOR HIPPOCRATIC MEDICINE, on behalf of itself, its member organizations, their members, and these members' patients; AMERICAN ASSOCIATION OF PRO-LIFE OBSTETRICIANS AND GYNECOLOGISTS, on behalf of itself, its members, and their patients; AMERICAN COLLEGE OF PEDIATRICIANS, on behalf of itself, its members, and their patients; CHRISTIAN MEDICAL & DENTAL ASSOCIATIONS, on behalf of itself, its members, and their patients; SHAUN JESTER, D.O., on behalf of himself and his patients; REGINA FROST-CLARK, M.D., on behalf of herself and her patients; TYLER JOHNSON, D.O., on behalf of himself and his patients; and GEORGE DELGADO, M.D., on behalf of himself and his patients,

*Plaintiffs,*

**No. 2:22-cv-00223-Z**

v.

U.S. FOOD AND DRUG ADMINISTRATION; ROBERT M. CALIFF, M.D., in his official capacity as Commissioner of Food and Drugs, U.S. Food and Drug Administration; JANET WOODCOCK, M.D., in her official capacity as Principal Deputy Commissioner, U.S. Food and Drug Administration; PATRIZIA CAVAZZONI, M.D., in her official capacity as Director, Center for Drug Evaluation and Research, U.S. Food and Drug Administration; U.S. DEPARTMENT OF HEALTH AND HUMAN SERVICES; and XAVIER BECERRA, in his official capacity as Secretary, U.S. Department of Health and Human Services,

*Defendants.*

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**DECLARATION OF GALEN LEIGH SHERWIN IN SUPPORT  
OF UNOPPOSED APPLICATION FOR ADMISSION  
PRO HAC VICE WITHOUT DESIGNATION OF LOCAL COUNSEL**

I, Galen Leigh Sherwin, a lawyer duly admitted to the courts of the State of New York and the U.S. Courts of Appeals for the Second, Third, and Fourth, Eighth, Tenth, and Eleventh Circuits, and the U.S. District Courts for the Eastern and Southern Districts of New York and the District of Colorado, do hereby declare under penalty of perjury as follows:

1. I am Special Counsel for Reproductive Justice in the office of Letitia James, Attorney General of the State of New York. I submit this declaration pursuant to Local Rules 89.9 and 83.10(a) in support of my application for pro hac vice admission without designation of local counsel for the limited purpose of appearing on behalf of the States of New York, California, Colorado, Connecticut, Delaware, Hawai‘i, Illinois, Maine, Maryland, Massachusetts, Michigan, Minnesota, Nevada, New Jersey, New Mexico, North Carolina, Oregon, Pennsylvania, Rhode Island, Washington, and Wisconsin, and the District of Columbia (proposed amici States) as amici curiae in this matter.

2. This application is filed contemporaneously with the proposed amici States’ Motion for Leave to File a Brief in Support of Defendants and in Opposition to Plaintiffs’ Motion for a Preliminary Injunction and the proposed amici States’ Brief supporting that motion.

3. The proposed amici States do not request party status or oral argument time, and seek leave only to file an amicus brief to provide the Court with useful information that will aid the Court in resolving the pending motion. Accordingly, an order granting leave to file the amicus brief would obviate the need for local counsel.

WHEREFORE, I respectfully request to be admitted pro hac vice without the designation of local counsel for the limited purpose of appearing on behalf of proposed amici States.

Dated: New York, New York  
February 10, 2023

/s/ Galen Leigh Sherwin  
GALEN LEIGH SHERWIN

**CERTIFICATE OF CONFERENCE (Local Rule 7.1)**

Galen Leigh Sherwin, counsel for movant the State of New York, conferred via email with counsel for plaintiffs. Counsel for plaintiffs indicated they do not oppose this application for admission pro hac vice without designation of local counsel.

Galen Leigh Sherwin also conferred via email with counsel for defendants and counsel for intervenor defendant, who confirmed that defendants and intervenor defendant do not oppose movant's request for admission pro hac vice without designation of local counsel.

Dated: New York, New York  
February 10, 2023

/s/ Galen Leigh Sherwin  
GALEN LEIGH SHERWIN